

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG. PHILIPS LCD CO., LTD.,)	
)	
Plaintiff,)	C.A. No. 06-726 (JJF)
)	
CHI MEI OPTOELECTRONICS)	
CORPORATION; AU OPTRONICS)	
CORPORATION; AU OPTRONICS)	
CORPORATION OF AMERICA;)	
TATUNG COMPANY; TATUNG)	
COMPANY OF AMERICA, INC.;)	
AND VIEWSONIC CORPORATION,)	
)	
Defendants.)	

DECLARATION OF ARTHUR P. LICYGIEWICZ

OF COUNSEL:

Kenneth R. Adamo
Robert C. Kahrl
Arthur P. Licygiewicz
Jones Day
North Point
901 Lakeside Avenue
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(216) 586-3939

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Hercules Plaza
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*Attorneys for Defendant
Chi Mei Optoelectronics Corporation*

Dated: April 6, 2007

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LG. PHILIPS LCD CO., LTD.,

Plaintiff,

v.

**CHI MEI OPTOELECTRONICS
CORPORATION; AU OPTRONICS
CORPORATION, AU OPTRONICS
CORPORATION OF AMERICA;
TATUNG COMPANY; TATUNG
COMPANY OF AMERICA, INC.; AND
VIEWSONIC CORPORATION,**

Defendants.

Civil Action No. 06-726 (JJF)

DECLARATION OF ARTHUR P. LICYGIEWICZ

I, Arthur P. Licygiewicz, hereby declare and state as follows:

1. I make this Declaration in support of the Chi Mei Optoelectronics Corporation's Motion to Dismiss Plaintiff's Complaint for Patent Infringement for Lack of Personal Jurisdiction and Insufficiency of Service of Process. The statements made in this Declaration are based on my own personal knowledge and on information that I believe to be true and correct, and if called as a witness, I could and would testify competently to the following facts.

2. I am an attorney at Jones Day and am one of the attorneys representing Chi Mei Optoelectronics Corporation in this matter

3. Attached at Exhibit 1 hereto is a true and correct copy of the Notice of Service on Defendant Chi Mei Optoelectronics Corporation Pursuant to 10 Del.C. § 3104 (Dkt. No. 12).

I declare, under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct.

Date: April 5, 2007



Arthur P. Licygiewicz

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.

CHI MEI OPTOELECTRONICS
CORPORATION; AU OPTRONICS
CORPORATION; AU OPTRONICS
CORPORATION AMERICA; TATUNG
COMPANY; TATUNG COMPANY OF
AMERICA, INC.; AND VIEWSONIC
CORPORATION,

Defendants.

Civil Action No. 06-726(JJF)

**NOTICE OF SERVICE ON DEFENANT
CHI MEI OPTOELECTRONICS CORPORATION
PURSUANT TO 10 DEL.C. §3104**

Plaintiff L.G. Philips LCD Co., Ltd. ("LG. Philips") hereby provides notice pursuant to 10 Del.C. §3104 as follows:

Defendant Chi Mei Optoelectronics ("Chi Mei") is a Taiwanese Corporation with its principal place of business located at 2F, No. 1, Chi -Yeh Road, Tainan Science Based Industrial Park, Hsinshih Hsiang, Tainan Hsien 710, TAIWAN 74147, ROC.

On February 16, 2007, we caused to be mailed to Chi Mei Optoelectronics, by registered mail, return receipt requested, a notice letter, a copy of which is attached hereto as Exhibit A, and made a part hereof, together with copies of the Summons and the Complaint for Patent Infringement and Demand for Trial by Jury as served upon the Secretary of State of Delaware. The Summons together with the Return of Service is attached hereto, and made a part hereof as

Exhibit B. The notice letter and copies of the complaint were contained in the same envelope at the time of its mailing on February 16, 2007.

Attached hereto and made a part hereof as Exhibits C is the usual receipts given by the United States Post Office at the time of mailing to Chi Mei Optoelectronics on February 16, 2007, of the registered letter containing the Summons and Complaint.

February 20, 2007

THE BAYARD FIRM

/s/ Richard D. Kirk(rk0922)

Richard D. Kirk (rk0922)

Ashley B. Stitzer (as3891)

222 Delaware Avenue

Suite 900

Post Office Box 25130

Wilmington, Delaware 19899-5130

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(302) 655-5000

Counsel for Plaintiff

LG.PHILIPS LCD CO., LTD.

OF COUNSEL:

Gaspare J. Bono

Matthew T. Bailey

R. Tyler Goodwyn

Lora A. Brzezynski

Cass W. Christenson

McKenna Long & Aldridge LLP

1900 K Street, NW

Washington, DC 20006

(202) 496-7500

EXHIBIT A

THE BAYARD FIRM

A T T O R N E Y S

222 DELAWARE AVENUE, SUITE 900
P.O. Box 25130
WILMINGTON, DE 19899
ZIP CODE FOR DELIVERIES: 19801

III MERITAS LAW FIRMS WORLDWIDE
www.bayardfirm.com

302-655-5000
(FAX) 302-658-6395

WRITER'S DIRECT ACCESS

(302) 429-4208
rkirk@bayardfirm.com

February 16, 2007

REGISTERED MAIL
RETURN RECEIPT REQUESTED

Chi Mei Optoelectronics Corporation
2F, No. 1, Chi-Yeh Road
Tainan Science Based Industrial Park
Hsinshih Hsiang, Tainan Hsien 710
TAIWAN 74147, R.O.C.

RE: *LG.Philips LCD Co., Ltd. v. Chi Mei Optoelectronics Corporation, et al.*
C.A. No. 06-726 (D.Del.)

Ladies and Gentlemen:

In accordance with the provisions of 10 Del. C. § 3104, we enclose copies of the Summons and the Complaint for Patent Infringement and Demand for Jury Trial served upon Chi Mei Optoelectronics Corporation by serving the Secretary of State of Delaware. Such service was made on February 15, 2007.

Under the provisions of 10 Del. C. § 3104, service of summons and the complaint upon the Secretary of State of Delaware is as effectual to all intents and purposes as if it had been made upon you personally within the State of Delaware.

We suggest you deliver these papers immediately to your attorney.

Very truly yours,



Richard D. Kirk

RDK/tn
Enclosures
File No. 31066-3

EXHIBIT B

AO 440 (Del Rev. 10/01) Summons in a Civil Action

United States District Court

District of

DELAWARE

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.

SUMMONS IN A CIVIL CASE

CASE NUMBER: 06-726-JJF

CHI MEI OPTOELECTRONICS CORPORATION; AU
OPTRONICS CORPORATION; AU OPTRONICS
CORPORATION AMERICA; TATUNG COMPANY;
TATUNG COMPANY OF AMERICA, INC.; AND
VIEWSONIC CORPORATION,

Defendants.

TO: Chi Mei Optoelectronics Corporation
c/o Secretary of State of the State of Delaware
John G. Townsend Building, Duke of York Street
Dover, DE 19901

YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S ATTORNEY (name and address)

Richard D. Kirk, Esq.
Ashley B. Stitzer, Esq.
The Bayard Firm
222 Delaware Avenue, Suite 900
Wilmington, Delaware 19801
302-655-5000 (phone)
302-658-6395 (fax)

an answer to the complaint which is hereby served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. An answer that you serve on the parties to this action must be filed with the Clerk of this Court within a reasonable period of time after service.

PETER T. DALLEO

CLERK

DATE

APR 13 2007

Erinette Waters
(By) DEPUTY CLERK

AO 440 (Rev. 8/01) Summons in a Civil Action

RETURN OF SERVICE		
Service of the Summons and Complaint was made by me ⁽¹⁾	DATE <u>Feb 15 2007</u>	
NAME OF SERVER (PRINT) <u>JACK FAIRFELL</u>	TITLE <u>Process Server</u>	
Check one box below to indicate appropriate method of service		
<input checked="" type="checkbox"/> Served personally upon the defendant. Place where served: <u>Secretary of State of Delaware 411</u> <u>Rehoboth Street Dover DE 19901 Service Accepted by Karen CHAMBERLAIN</u> <u>at 12:05 pm</u>		
<input type="checkbox"/> Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein. Name of person with whom the summons and complaint were left: _____		
<input type="checkbox"/> Returned unexecuted: _____		
<input type="checkbox"/> Other (specify): _____		
STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL
DECLARATION OF SERVER		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.</p> <p>Executed on <u>2/15/07</u> <u><i>Jack Fairfell</i></u> <small>Date</small> <small>Signature of Server</small></p> <p style="text-align: right;"><u>15 East North Street Dover DE 19901</u> <small>Address of Server</small></p>		

⁽¹⁾ As to who may serve a summons see Rule 4 of the Federal Rules of Civil Procedure.

EXHIBIT C

Registered No. LR3660003005 Date Stamp WILMINGTON DE 1203 1203

Reg. Fee \$	Special \$
Handling \$	Delivery \$
Charge \$	Return \$
Postage \$	Receipt \$
	Restricted \$
	Delivery \$

Received by VB

To Be Completed By Customer

Customer Must Declare Full Value \$ 222 Delaware Avenue, Suite #901

With Postal Insurance ☐ Without Postal Insurance ☐ Indemnity is Limited (See Reverse)

FROM The Bayard Firm
222 Delaware Avenue, Suite #901
Wilmington, DE 19801

TO Chilmei Optoelectronics Corp
2F No 2 Chd-Yen Rd
Hsinchu, Taiwan 300
Taiwan, R.O.C.

All Entries Must Be in Ballpoint or Typed (Please Print)

To Be Completed By Post Office

PS Form 3806, February 1995

Receipt for Registered Mail (Customer Copy) (See Information on Reverse)

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on April 6, 2007, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

BY HAND DELIVERY

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Ashley Blake Stitzer, Esq.
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rkirk@bayardfirm.com
astitzer@bayardfirm.com

BY HAND DELIVERY

Edmond D. Johnson, Esq.
Thomas H. Kovach, Esq.
Pepper Hamilton LLP
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Wilmington, DE 19899-1709
johnsone@pepperlaw.com
kovacht@pepperlaw.com

I hereby certify that on April 6, 2007 I have sent the foregoing document by

Federal Express to the following non-registered participants:

Gaspare J. Bono, Esq.
Matthew T. Bailey, Esq.
Lora A. Brzezynski, Esq.
Cass W. Christenson, Esq.
McKenna Long & Aldridge LLP
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John N. Zarian, Esq.
Samia E. McCall, Esq.
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/s/ Philip A. Rovner
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